

**REMARKS**

**Summary**

This Amendment and Response to Interview Summary is responsive to the Office Action mailed on May 15, 2006 and the Interview Summary mailed on July 26, 2006. Claims 1-71 are pending. Claims 1 and 36 are amended herein.

As a preliminary matter, Applicants would like to thank the Examiner for the courteous and productive telephone interview held on July 13, 2006, the details of which are set forth below.

Claims 1-6, 8-12, 18-41, 43-47, and 52-71 are rejected under 35 U.S.C. § 103(ab) as being anticipated by Fujita (US 5,315,523) in view Iriguchi (US 6,047,225) and Schwenke (US 6,553,268).

Claims 7 and 42 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Fujita in view of Iriguchi, Schwenke and Frey (US 5,691,909).

Claims 13-17 and 48-51 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Fujita in view of Iriguchi, Schwenke and Kuni (US 5,586,224).

Applicants respectfully traverse these rejections in view of the amended claims and the following comments.

**Summary of July 13, 2006 Telephone Interview and Discussion of Amended Claims**

Applicants' undersigned counsel conducted a telephone interview with the Examiner to discuss proposed claim amendments in order to overcome the rejections in view of Fujita, Iriguchi, and Schwenke. Applicants agree with the Examiner's Interview Summary insofar as it indicates that: Fujita discloses only a tool and a workpiece, and no operating unit; Iriguchi shows only a visualization of the workpiece and does not show any operating units; and Schwenke shows only a block diagram representation of the workpiece and operating units but does not provide a visualization of their movements.

Applicants counsel did discuss the amended claim language suggested by the Examiner and mentioned in the Examiner's Interview Summary, namely "visualizing said at least two

virtual operating units and said specified virtual action(s) showing movement of said at least one virtual operating unit on said machine display, in relation to said workpiece.” However, Applicants’ counsel pointed out to the Examiner that such language was unduly limiting as Applicants’ invention showed relative movement between the operating units, one of which can be the operating unit which carries the workpiece.

Applicants’ counsel agreed with the Examiner to check with Applicants as to claim amendments specifying “visualizing said at least two virtual operating units and said specified virtual action(s) of said at least one virtual operating unit on said machine display to show relative movement between said at least two virtual operating units on said machine display.” The Examiner acknowledged that the prior art did not disclose or suggest any visualization of the relative movement between operating units. The Examiner agreed that such an amendment would overcome the rejections under 35 U.S.C. § 103(a) set forth in the Office Action.

Claim 1 is amended herein in accordance with the agreement reached with the Examiner during the Telephone Interview. Claim 36 is amended in a similar manner.

Applicants claimed invention provides a visualization of the virtual actions of at least two virtual operating units, and shows the relative movement between the at least two virtual operating units. This means, for example, that once virtual actions are specified, the display can provide a visualization of one operating unit moving relative to one or more stationary operating unit(s), or a visualization of two or more virtual operating units where at least two operating units are moving. In this way it can be determined, prior to actually machining a workpiece, whether the specified virtual actions will cause a collision.

For example, if one of the virtual operating units carries the workpiece and has a housing for the workpiece carrying means and another virtual operating unit carries a turret for tools and has a large housing for the turret, there can be numerous situations where collisions can occur. For example, collisions may occur between non-used tools of the turret and the housing of the virtual operating unit carrying the workpiece if a tool of the turret is moved in its operative position with respect to the workpiece. Further, numerous collisions can occur if for example the turret is rotated to bring another tool from an inoperative position to an operative position and the current tool in the operative position is moved into an inoperative position. Such a rotation of the

turret and movement of the operating unit carrying the turret can cause collisions between either the workpiece held in the other virtual operating unit or the housing of the other virtual operating unit.

Applicants respectfully submit that the prior art of record does not disclose or remotely suggest visualizing at least two virtual operating units and specified virtual action(s) of at least one virtual operating unit on a machine display to show relative movement between the at least two virtual operating units on the machine display, as claimed by Applicants.

Applicants respectfully submit that the present invention is not anticipated by and would not have been obvious to one skilled in the art in view of Fujita, taken alone or in combination with Iriguchi and Schwenke, or any of the other prior art of record.

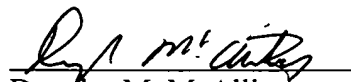
Further remarks regarding the asserted relationship between Applicant's claims and the prior art are not deemed necessary, in view of the amended claims and the foregoing discussion. Applicants' silence as to any of the Examiner's comments is not indicative of an acquiescence to the stated grounds of rejection.

Withdrawal of the rejections under 35 U.S.C § 103(a) is therefore respectfully requested.

Conclusion

The Examiner is respectfully requested to reconsider this application, allow each of the pending claims and to pass this application on to an early issue. If there are any remaining issues that need to be addressed in order to place this application into condition for allowance, the Examiner is requested to telephone Applicants' undersigned attorney.

Respectfully submitted,



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